

April 4, 2022

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Hon. Ronnie Abrams
United States District Judge
U.S. District Court for the Southern District of New York
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

Re: Julien v. Commissioner of Social Security
Civil Action No: 1:21-cv-07671-RA

Dear Judge Abrams:

This letter respectfully requests an extension of time of thirty (30) days for Plaintiff to serve her Motion for Judgment on the Pleadings in this matter. Plaintiff's Motion for Judgment on the Pleadings is currently due on April 9, 2022. This is Plaintiff's second request for an extension of time to file her Brief.

Due the influx of Administrative Records being filed by the Commissioner due to the backlog created by COVID-19, Counsel has multiple, simultaneous filing deadlines that cannot be met. Counsel's office is in the process of hiring and training additional attorneys to combat this increased workload. This has caused staff in Counsel's office to experience unusually heavy workloads. Plaintiff cannot meet the current briefing deadline. This extension is needed to thoroughly and properly prepare the brief. Plaintiff does not anticipate any further extension requests in this matter regarding the filing of Plaintiff's brief. This request is not made with the purposes to delay, but to allow for thorough and proper preparation of the opening brief.

If this request is granted, Plaintiff's Motion for Judgment on the Pleadings will be due on May 9, 2022. Subsequently, in accordance with the pattern of the Scheduling Order issued by this Court (Dkt. No. 5), the Commissioner's response to the Motion for Judgment on the Pleadings would then be due July 8, 2022. Plaintiff's Reply would then be due July 29, 2022.

Thank you for your consideration.

Respectfully submitted,

/s/ Howard D. Olinsky
Howard D. Olinsky, Esq.
Bar Code H06529
Counsel for Plaintiff

Application granted.

CC [via ECF]: Jason Peck, Esq. (Counsel for Defendant)

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SO ORDERED.


Hon. Ronnie Abrams
4/5/22